

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

MARTÍN JONATHAN BATALLA VIDAL,  
ANTONIO ALARCON, ELIANA FERNANDEZ,  
CARLOS VARGAS, MARIANO  
MONDRAGON, and CAROLINA FUNG FENG,  
on behalf of themselves and all other similarly  
situated individuals, and MAKE THE ROAD  
NEW YORK, on behalf of itself, its members, its  
clients, and all similarly situated individuals.

*Plaintiffs,*

v.

ELAINE C. DUKE, Acting Secretary, Department  
of Homeland Security, JEFFERSON  
BEAUREGARD SESSIONS III, Attorney General  
of the United States, and DONALD J. TRUMP,  
President of the United States,

*Defendants*

Case No. 1:16-cv-04756 (NGG) (JO)

**NOTICE OF MOTION TO ADMIT  
COUNSEL *PRO HAC VICE***

TO: Kate Bailey  
U.S. Department of Justice  
Civil Division, Federal Programs  
20 Massachusetts Ave NW, Rm 6139  
Washington, DC 20001  
T: 202-514-9239  
F: 202-616-8470  
kate.bailey@usdoj.gov

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate of Good Standing annexed thereto, we will move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of movant, a member of the firm of Baker & Hostetler LLP and a member in good standing of the bar of the State of New York, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel for *Amicus Curiae*, Latino Justice

PRLDEF, *et al.* There are no pending disciplinary proceedings against me in any State or Federal court.

Dated: December 21, 2017.

Respectfully submitted:

/s/ Pedro J. Perez  
Pedro J. Perez  
BAKER & HOSTETLER, LLP  
45 Rockefeller Plaza  
New York, N.Y. 10111  
Telephone: 212.847.2873  
Facsimile: 212.589.4201  
Email: [pperez@bakerlaw.com](mailto:pperez@bakerlaw.com)